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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

15 || In re:

Case No. 19-30088 (DM)

16 || PG&E CORPORATION

Chapter 11

17 -and-

(Lead Case)

18
12 || **PACIFIC GAS AND ELECTRIC
COMPANY,**

(Jointly Administered)

Debtors

- Affects PG& E Corporation
- Affects Pacific Gas and Electric Company
- Affects both Debtors

26 *All papers shall be filed in the Lead Case,
No. 19-30088 (DM)

**DECLARATION OF BRENT C.
WILLIAMS IN SUPPORT OF MOTION
OF THE OFFICIAL COMMITTEE OF
TORT CLAIMANTS FOR RELIEF
FROM AUTOMATIC STAY TO
PERMIT STATE COURT JURY TRIAL
OF 2017 TUBBS WILDFIRE CLAIMS**

Date: July 23, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

1 1. I, Brent C. Williams, am a Managing Director and Co-Head of Lincoln's Special
2 Situations Group at Lincoln Partners Advisors LLC ("Lincoln"), which has its principal office at
3 500 West Madison Street, Suite 3900 Chicago, IL. I am authorized to execute this declaration on
4 behalf of Lincoln. Unless otherwise stated in this declaration, I have personal knowledge of the
5 facts set forth herein.

6 2. I am making this declaration in support the Motion of the Official Committee of
7 Tort Claimants for Relief from Stay to Permit State Court Jury Trial of a 2017 Tubbs Wildfire
8 Claims (“**Motion**”). Capitalized terms used but not defined herein shall have the same meaning
9 ascribed to them in the Motion.

10 3. The dispute over a sizeable claim like the 2017 Tubbs fire is a large impediment to
11 the accurate calculation of fire-related claims for purposes of plan confirmation and negotiations in
12 this case. Based upon my experience, clarity on the disputed Tubbs fire claims needs to be resolved
13 in order to proceed forward with productive negotiations of a consensual plan or confirmation of a
14 contested plan of reorganization. The dollar amount of the 2017 Tubbs fire claims is material, and
15 the parties need to decide how to treat the claims in a plan or for distribution purposes.

16 I declare under penalty of perjury under the laws of the United States of America that the
17 foregoing is true and correct. Executed on July 2, 2019.

✓ ✓

Brent C. Williams